

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

RESHUDIA KEYRIA RICKS, Plaintiff,	:	
	:	
	:	Civil Action
vs	:	File No. 4:15-CV-240-HLM
	:	
	:	
LISA WILLIAMS BLAKE, M.D.,	:	
NORTHWEST GEORGIA MEDICAL	:	
CLINIC, P.C., and NORTHWEST	:	
GEORGIA MEDICAL CLINIC II, LLC,	:	
Defendants.	:	

PLAINTIFF’S RULE 26(a)(1) INITIAL DISCLOSURE

COMES NOW Plaintiff Reshudia Keyria Ricks (hereinafter known as “Ricks”), named Plaintiff in the above-entitled civil action, in accordance with Rule 26(a)(1) of the Federal Rule of Civil Procedure and Northern District of Georgia Local Rule 26.1, and files these Initial Disclosures showing this Honorable Court as follows:

- I. The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

Reshudia Keyria Ricks
110 Fern Avenue
Cocoa, Florida 32922

Marcilla Dupree
800 North Fiske Blvd., Apt. 403
Cocoa, Florida 32922

407-758-4718

Keanna Harris
216 Evergreen Trail, Apt. C
Cartersville, GA 30121
706-723-1423

Dr. Brown
CSI worker – Mauricia Jackson
Highland Rivers Health
1401 Applewood Drive
Dalton, Georgia 30720
706-529-4131

Dr. Debra Willis
Coastal Mental Health
571 Haverty Court
Rockledge, FL 32955

Dr. Matthews
1770 Cedar Street
Rockledge, FL 32955

Defendant Lisa Blake, M.D.

Dixon L. Freeman, M. D.
Northwest Georgia Medical Clinic
15 Riverbend Drive, Suite 200
Rome, Georgia 30161

Stephen Baxter, M. D.
Floyd Medical Center
304 Turner McCall Blvd.
P.O. Box 233
Rome, Georgia 30162

Joseph Spota, CRNA
Floyd Medical Center

Maegan Teems, RN

Floyd Medical Center

Sandra McCray, RN
Floyd Medical Center

Susan Crowe, RN
Floyd Medical Center

Donna Kerwood
Floyd Medical Center

Montgomery Reid
Floyd Medical Center

Mary Jacobs, RN
Floyd Medical Center

S. Davis, RN
Floyd Medical Center

Brandi Cash, RN
Floyd Medical Center

Jennifer Benefield
Floyd Medical Center

Constance Wright
Floyd Medical Center

Any and all personnel employed by or affiliated with Floyd Medical Center, who were involved in rendering medical treatment to plaintiff.

Any and all personnel employed by or affiliated with Northwest Georgia Medical Clinic, who were involved in rendering medical treatment to plaintiff.

Plaintiff reserves the right to supplement her witness list as discovery proceeds.

- II. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

Medical records from Floyd Medical Center
Medical records from Northwest Georgia Medical Clinic
Medical records Highland Rivers Health

Plaintiff reserves the right to supplement her document list as discovery proceeds.

- III. A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and**

Plaintiff intends to seek damages for past, present, and future pain and suffering, as well as physical and mental damages resulting from the care provided, to be determined by the enlightened conscience of the jury.

Plaintiff reserves the right to supplement her computation of damages as discovery proceeds.

- IV. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Plaintiff does not have such documents.

Plaintiff reserves the right to supplement her witness list as discovery proceeds.

Respectfully submitted this 30th day of March, 2016.

/s/ CTB

Charles T. Brant
Georgia Bar No. 078070

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